



DATE: January 7, 1980

TO: Ken Mensing

FROM: Dave Wieties

SUBJECT: Special Waste Disposal and Variance Petition by Shell Oil Company

On January 4, 1980 a meeting was conducted regarding the above subject. Present were myself, Joe Petrilli, John Williams, and Mary Drake. Representing Shell were John Cole and a member of his staff.

With regard to the petition for variance from Chapter 9 Rules and Regulations all were in agreement that Shell should be allowed to haul special wastes under their own manifest system with short expenses of the haul being on public highways. John Williams will prepare a recommendation to Mary Drake (A.G.'s Office) and its anticipated this action will be resolved smoothly.

Regarding on site disposal of special/Hazardous wastes Joe Petrilli outlined Shell's responsibilities under existing Rules and Regulations and under proposed RCRA regulations. He identified wastes which would require further study from the list supplied by Shell.

I then raised my doubts as to the suitability of Shell's disposal site as it is a low lying area with little or no geologic study ever being made. Topographic maps make this site appear unsuitable.

Shell has agreed to submit a more complete analysis of the questionable wastes and to begin a preliminary hydrogeologic study of the disposal area. They will report to the Agency on their results. At that time we can more readily determine the extent of their responsibilities in waste disposal.

DLW:jlr

cc: Bill Child

